REMARKS

Claims 1-2, 4, 7-8, 15-16, 20, 23-24, 26, 29-30, 37-38, and 42 are rejected under 35 USC 103(a) as unpatentable over Reinhardt (US 5,598,565) in view of Helman et al. (US 6,400,371). Claims 3 and 25 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Yamazaki et al. (US 2002/018060). Claims 5-6, and 27-28 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Oshima et al. (US 6,535,985). Claims 9, 11, 17, 31, 33, and 39 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Yamazuki et al. (US 2002/0018060). Claims 10 and 32 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Yamazuki et al. (US 2002/0018060) and Oshima et al. (US 6,535,985). Claims 12, 14, 34, and 36 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Paolini et al. (US 2002/0196257). Claims 13 and 15 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Yamazuki et al. (US 2002/0018060) and Paolini et al. (US 2002/0196257). Claims 18, 40, 45 and 46 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Yasui et al. (US 5,248,963). Claims 19 and 41 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Choi (US 2001/0012005). Claims 22, and 44 are rejected under 35 USC 103(a) as being unpatentable over Reinhardt (US 5,598,565) and Helman et al. (US 6,400,371) as applied to claims 1 and 23 above, and further in view of Funyu (US 6,320,587).

Reconsideration and allowance of the claims requested for the following reasons.

As defined in claims 1 and 23, the present invention is directed to a method and apparatus for reducing the power used by a display device having light emitting pixels, that includes steps and means for: receiving formatted information for presentation on the display device, the formatted information being defined by a markup language having tags and parameters associated with the tags; modifying the tags and/or the parameters associated with the tags of the formatted information to reduce the number and/or intensity of bright pixels in a display of the formatted information to produce modified formatted information; rendering the modified formatted information; and displaying the rendered modified formatted information on the display device.

Reinhardt discloses a method for saving power in a display by reducing power to all, or a subset of less important pixels in the display. Reinhardt accomplishes this by providing a flat panel display power management system 195 in a flat panel display driver that reduces the amount of power provided to some or all of the pixels in the display, for example by "reducing the refresh rate or the frame rate of the flat panel display system" see Col. 4, lines 31-36.

Helman et al. disclose a method of modifying the foreground and background colors of a color television image to minimize display artifacts while preserving the relative color contrast between foreground and background. The image is defined by HTML codes and the colors are modified by changing the HTML codes.
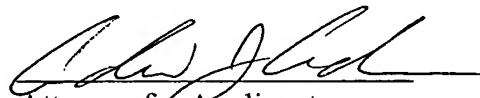
The Examiner notes that Reinhardt discloses a method of screen power saving having all of the elements of the present invention except the features that the image is defined by a markup language having tags and parameters associated with the tags and that the tags and/or the parameters associated with the tags of the formatted information are modified to reduce the number and/or intensity of bright pixels in a display of the formatted information to produce modified formatted information. The Examiner then cites Helman et al. for showing a method of minimizing display artifacts in a color television signal and states that it would have been obvious to use the teachings of Helman et al. to minimize display artifacts while preserving the relative

visual contrast between foreground and background. <u>The Examiner, however, did not argue that it would have been obvious to use the teachings of Helman et al. in the method and apparatus of Reinhardt to reduce the number and/or intensity of bright pixels in a display by modifying the tags or parameters associated with tags in a markup language.</u> It must be concluded therefore that the Examiner has failed to make a prima facie argument for obviousness of the claims. Had the Examiner made this argument, applicant would point out that there is no motivation in the prior art for making such a modification to the teachings of Reinhardt. The problem solved by Helman et al. (i.e. reducing artifacts) is a different one than that solved by Reinhardt (i.e. saving power) so there is no suggestion in either Reinhardt or Helman et al. to modify the method of Reinhardt in light of the teachings of Helman et al. in order to obtain the present claimed invention. The Examiner would merely have been reconstructing the prior art in light of applicants' teaching.

It is believed therefore that claims 1 and 23 (the independent claims) are patentable over the prior art. The remainder of the claims depend from one of these allowable claims and are believed to be patentable for at least the same reasons.

It is believed that the claims in the application are allowable over the prior art and such allowance is respectfully requested.

Respectfully submitted,

Attorney for Applicants
Registration No. 33,564

Andrew J. Anderson/vjr
Rochester, NY 14650
Telephone: (585) 722-9662
Facsimile: (585) 477-1148